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December 28, 2023

Via ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1660
New York, New York 10007

Re: *Shellyne Rodriguez v. The City of New York et al.* (21-cv-10815)(PKC)(VF)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney assigned to the defense of the above-referenced matter. Pursuant to the November 20, 2023 Order, we write jointly with Plaintiff to provide the Court with the status of the above referenced case.

The parties have no discovery disputes to report since the last status letter that was filed on October 31, 2023. See Docket No. 70. The parties have met the deadlines related to amending pleadings and have proceeded with discovery. On November 3, 2023, Plaintiff filed a First Amended Complaint (the "FAC"). The FAC named two new defendants, Donald Sehl and Noelle Cunningham. On November 10, 2023, Defendants served responses to Plaintiff's interrogatories and request for documents. On November 17, 2023, Defendants (except Sehl and Cunningham) filed and served their answer to the FAC.¹ On December 22, 2023, Defendants served interrogatories, requests for documents, and a deposition notice on Plaintiff.

Thank you for your time and attention to this matter.

Respectfully submitted,

Peter Scutero /s
Senior Counsel
Special Federal Litigation Division

¹ Upon information and belief, it appears neither Sehl nor Cunningham have been served with a copy of the FAC.

cc: All Counsel (via ECF)